## Comments on draft New England North West Regional Plan

# Lack of detail, supporting evidence and consultation

Overall the plan reads as highly aspirational and at times ideological rather than an evidence-based document. It has a distinct lack of detail on the data used to inform the plan. The population growth data for Armidale, for example, indicates a significant increase in population for the region, largely centred on Tamworth and Armidale, but lacks specifics of the numbers for each of these centres. Moreover, while planning has historically relied on past data and their extrapolation into the future, in an age of transformational technologies, past data may have little relevance for the future. Have the plan makers considered constant data management, using data from unconventional unheralded sources such as 'big data'? The plan doesn't talk about harnessing big data in its many different forms to track changes in underlying economy/society/ environment or tracking the impact of plan provisions. In short, we wonder how will the people charged with overseeing and implementing the plan handle dramatic discontinuities such as occur when tipping points are reached or elements of chaos theory step in? Without a more comprehensive document containing detail the value of the plan to developing appropriate and relevant directions for the future of the NE/NW region is called into question.

In addition, the plan could have been more effective if widespread consultation had occurred with individuals and interest groups in the development of a regional strategic plan from first principles. This plan reflects the traditional approach of developing a plan to confirm to a pre-determined vision and then placed on consultation. It is unfortunate that an opportunity has been missed to create a truly visionary plan to assist communities shape their own futures.

### Lack of foresight and innovative thinking

Overall, the plan appears to propose continuation of existing government policies and direction. Emerging issues of any significance are generally omitted. In this regard the plan indicates a 'business as usual' approach to the future of land use in the region. The strategies generally rely on continuing processes and activities largely using current policy and practice. In short, this plan is conventional in what is going to be an unconventional world over the next 20 years.

For example, there is strong focus on continuing to grow intensive agriculture. The implication here is that continuing this model of production will be socially and economically beneficial for the region. Yet, the plan appears to ignore the large body of scientific research that has highlighted the serious social, economic and environmental problems with the intensive model of agriculture. Without overstating the point, these problems include the continued agglomeration of smaller farms into large corporate owned entities, growing farm debt and therefore reduced viability of traditional family farmers, a changing climate including more frequent and severe droughts, the myriad challenges for Australian farmers operating in the volatile global market, and rapid technological changes. The plan makes no mention of how these already present problems will be addressed. In our view that the plan fails to recognise or attempt to deal with any of these challenges suggests a serious lack of hindsight or foresight.

Agriculture is but one sector that is being and will continue to be affected by the small and major changes on the horizon. In another example, the strategy discusses energy security and alternate technologies for regional production, such as wind and solar. The discussion,

however, is limited to large-scale provision through solar and wind-farms and the potential difficulties with connection to the existing grid system. This discussion omits any consideration of the rapid changes in technology currently occurring and the manner in which these will lead to self-sufficiency in power generation and provision at the local-level (town and individual). Changing technologies will obviate the need for direct grid connection. Direct connection will only be necessary if one wishes to feed power into the grid, as is currently possible now. Currently emerging technologies will reduce greenhouse gas emissions, reduce the load on the existing generation system; remove the need to build additional large-scale generation capacity; and provide the opportunity to generate new employment opportunities through the manufacture, installation and maintenance of the new technologies. There are examples of these systems are in existence throughout the world, including rural and regional Australia. These emerging technologies will change energy provision in the same manner the motor car made the horse redundant. The future direction of power provision has social, economic and environmental benefits that vastly exceed current approaches. Recognition of the changing nature of energy production and delivery should be included in a plan that proposes to provide policy direction for a 19- year timeframe.

### Aligning services and facilities with changing demographics

Some elements of the plan acknowledge changing demographics, especially in smaller villages and towns with an aging population profile and declining total population. The plan appropriately acknowledges the need for increased services to support these individuals and communities. The plan also acknowledges the importance of regional education to the future economic and social well-being of the region. The plan would be improved by strengthening the connection between the demographic changes and the opportunities to reframe education and service provision by linking these. In this way tertiary education could be linked with the demographic by producing more people with skills to assist the older and elderly members of the region. Similarly, discussion of services and facilities should be provided to align with the changing demographic.

### Lack of protection for productive peri-urban spaces

The plan acknowledges the need to preserve and protect productive agricultural land. The strategy is vague on the mechanism for achieving this. The implication is to protect broadacre / large-scale production. The plan ignores peri-urban land and the multi-functional values it provides to urban populations in the region. The example in Figure 14 of the Armidale Regional Council's 'Armidale Growth Precincts' (Figure 14, p. 61) indicates a 'future large lot residential investigation area' in a corridor to the west of the city. This corridor proposes linking the existing western city boundary with the rural-residential area in Uralla Shire, thereby creating a conurbation of rural-residential development in an area that has relatively high-quality agriculturally productive land. It would be more appropriate for large-lot residential land to be located in areas with lower production values. Further, the strategy does not indicate on what needs basis the corridor has been created. This indication has several negative effects in alienating this land from agricultural production, investment and maintenance on the basis that owners will be rewarded with increased property demand and value in the relatively foreseeable future. The Tamworth Regional Council Strategic Plan is also similarly flawed by zoning land in considerable excess of the current large-lot residential demand. Peri-urban land has particular social, economic and environmental values and should be considered in any future land use strategy.

### **Competing objectives**

Notwithstanding the problems we have outlined above relating to the plan's focus on growing intensive agriculture, there are direct contradictions between several of the main objectives, namely agricultural land preservation, expanding mining and mitigating climate change. There are a couple of points to illustrate. First, mining and agriculture are discussed as if they are compatible, yet they contest the same ground and emerging research suggest that the two are incompatible. The competing issues, as exampled on the Liverpool Plains, appear to be ignored and the competition between mining and agriculture are likely to increase, rather than diminish, over time. Second, beyond the localised impacts of mining, the global scientific community is steadfast in its option that we must keep coal in the ground if we are to stop dangerous climate change. Yet the plan includes goals for mining expansion and directs the region towards adapting to natural hazards and climate changes. It is obvious that continuing to mine coal and dealing with climate change cannot happen at the same time. The plan gives no indication as to how these competing objectives will be resolved or even that plan makers are aware they are outlining competing objectives. We need more information as to how planners think these competing objectives will be reconciled.

#### Conclusion

In conclusion, as a group of concerned citizens, albeit with expertise in various subdisciplines of geography and planning, we feel this draft plan is a missed opportunity for the NSW government to plan for the myriad changes and challenges facing the New England North West Region.

The plan fails to recognise the world is changing and requires change. Intensive agriculture is neither good for the environment nor the many small and medium-sized family farmers who struggle under mounting debt to remain viable. The plan fails to recognise the quiet technological and community changes happening in community energy generation. The 19-year time frame of the plan is too long to be able to make meaningful projections about population numbers, or likely technological changes that have the potential to transform agriculture, education, communication, health and many other areas. The plan fails to align changing services and facilities with changing demography nor does it adequately protect productive peri-urban spaces. Finally, the plan has obvious and problematic contradictions, particularly between its goals of preserving agricultural land, growing mining and mitigating climate change.

As citizens of the New England region we ask the NSW government to consider our concerns and meaningfully address them in a revised plan.

Sincerely,

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